

## Stormwater Loading Methods Conference Call Summary – July 3, 2008

Comments on stormwater loading methods were discussed during a June 26 conference call and several tentative agreements were reached per the June 26 meeting notes issued by the LWG. This document provides an update to those June 26 meeting notes including additional agreements reached during the July 3 conference call. Additional comments discussed and agreements reached -during July 3 are also provided below.

### Update to June 26 Tentative Agreements (updates noted in redline)

#### DEQ Comments

**Comment 1.** In Carl's 6-7-08 Meeting Summary, #1 describes how dups/refs would be evaluated to determine that "no substantial reason for divergence" vs. a "substantial reason for divergence" exists? What is a non-substantial or substantial reason?

**Status - Tentative Agreement.** Additional language defining substantial, should be added to the previous meeting's agreement in principle. It should specifically note that field and/or lab information related to procedures likely impacting results would constitute a "substantial reason".

**Comment 2.** Will sediment trap data "inherit" whatever reclassifications result from the evaluation of the stormwater data?

**Status - Tentative Agreement.** Generally, sediment trap reclassifications will follow stormwater reclassifications unless the sediment trap data strongly indicate not to. In either case, the stormwater data and sediment trap data will always be placed in the same category. Because there is very little stormwater data for pesticides, sediment trap data will govern any reclassifications for pesticides, and limited stormwater data for pesticides will follow the reclassifications indicated by the sediment trap data.

**Comment 3.** Will additional sources of TSS data (other than those mentioned in the document) be used, e.g., NPDES data? Will grab sample data be considered or only composite/EMC data? [Based upon the importance of the TSS value in the solids calculation, I'm particularly concerned about how much leeway the methodology allows relative to how this data would be used.]

**Status - Tentative Agreement.** Per Section 6.1.1.2 of the Draft Loading Methods Report, "TSS data available from studies other than the LWG stormwater composite sampling will be used *only* as a comparison to understand how typical or unusual study data may be."

**Comment 4.** I also have a more general question relating to how this process unfolds once we get agreement on the general approach. The methodology includes a number of analyses that will provide information for making subsequent (and often subjective) decisions on how to proceed (e.g., reclassification; sources and use of TSS data, etc.).

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How will these subsequent decisions be made? Will they come back to Tech Team? It seems to me that we'd only be doing half of our job if the Team's input and endorsement of the approach was limited to this stage of the process.

**Status – No Agreement Reached.** This was discussed again on July 3 call. Several options for check in points and implications of each for the schedule were discussed. The LWG will respond to EPA with a proposed process for check in and its related impact on the schedule, briefly discussed but no process was agreed to.

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**Verbal Comment 5.** – DEQ asked during the call if sediment trap duplicates would be evaluated and handled similar to discussion for stormwater duplicates.

**Status – Tentative Agreement.** It was agreed that sediment trap duplicates should be averaged regardless, due to the extremely limited data set. However, the analysis of divergent duplicates would still be conducted and the impact of these averaged data on the analysis would be evaluated.

#### City of Portland Comments

**Comment 1.** Impact of basin size on overall loading rate estimates for representative land use. We would like to discuss estimating land use loading rates on a flow-weighted basis as a more representative method.

**Status – Process for moving forward agreed to.** No agreement reached. This was extensively discussed again on July 3. It was agreed that EPA would consider weighting of stormwater concentration results for the purpose of obtaining an aggregate stormwater concentration value for each representative land use. EPA will consider weighting by the following methods: basin size, flow, number properties draining to the sampling location, and impervious surface amount. It was agreed that EPA would issue their recommendation in two weeks and that the Stormwater Technical Team would meet to discuss and agree on the most appropriate weighting method on July 31.

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#### Action Items

- ☐ City agreed to send copy of their analysis to team (already done by Dawn Sanders).
- ☐ EPA agreed to review City's information and consider what additional information or analysis, if any, would help support this decision.

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**Comment 2.** Reclassification of Representative and Unique basins: Currently, the Unique dataset has many non-unique analytes, as we all acknowledged during sample design. Consider moving all analytes not identified as potentially unique at the Unique sites to the Representative category a priori. This would result in two more divergent populations that would then be easier to determine potential "outliers" that could be considered for reclassification.

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**Status – Tentative Agreement.** The proposal was accepted. A draft table of which sites should be considered Unique by chemical was provided by EPA between the June 26 and July 3 calls. Refinement of the table was discussed on July 3. It was agreed that the LWG would issue a revised draft of the table considering the additional issues discussed and would provide to the Stormwater Technical Team for final approval.

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**Action Item –**

☐ Kristine Koch agreed to send around table listing *a priori* designations for Unique Sites by chemical (already done).

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☐ Team agreed to review and would comment and attempt to reach agreement via email discussion.

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**Comment 3.** Evaluating Duplicate Outliers within the context of other data for that representative land use to evaluate the overall impact of including that data point and using it for extrapolation. We should also discuss how we would make a decision.

**Status – Tentative Agreement.** A three step process was agreed to including

1. Conduct divergent duplicate analysis per June 5 agreement and segregate those duplicates from further analysis where substantial reasons exist (per above definition). Depending on reason, either one or both samples might be segregated.
2. For the remaining divergent samples, compare to range of results for that basin and land use. If both duplicates are generally within these ranges, keep them for further analysis. If not, segregate one or both as indicated by the range comparison.
3. For divergent duplicates that are not segregated, average the pair consistent with the normal duplicate averaging procedure.

**Comment 4.** Finish discussion of divergent sample size between basins and the potential impact it has on the loading rates. Anchor was to develop some analyses of these based on our last meeting.

**Status – Not discussed.** This comment is ~~may be resolved by path forward resolution of~~ described for City Comment 1.

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**Comment 5.** Discuss aggregation of light and heavy land use data.

**Status – Tentative Agreement.** It was agreed that these would not be aggregated, consistent with previous meetings agreement.

**EPA Comments Discussed on July 3**

~~Several EPA comments were verbally discussed, but no agreements were reached. These will be discussed next time, and Kristine Koch will provide them in writing prior to the next call.~~

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Attachment A provides a list of EPA comments and notes any additional agreements reached during the July 3 call to resolve those comments.

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